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I represent labor organizations and employees in matters before the NLRB. I write to provide information concerning the Board's representation case procedures in response to your request.

The amendments to the procedures adopted in 2014 represent modest and common-sense changes in the processing of petitions for an election. I urge the Board not to alter the amendments.

In my experience under the amended rules:

1. Unnecessary litigation has been reduced and the time required for the Board to process representation petitions has been shortened.
2. The rules have been made simpler and easier for union representatives and employees to understand.
3. Board practice has been brought more into line with judicial practice and thus made participation in representation cases easier for counsel.
4. All parties have been accorded due process.
5. Employers that wished to do so have mounted vigorous campaigns that have effectively conveyed the same types of information using the same methods as was the case prior to the amendments.
6. Employees have been better able to exercise their right to petition and to make a free choice of whether to be represented.
7. As a specific example the organizing I have been involved in across the country has become less contentious and more efficient for employers, employees, and the taxpaying citizens of the United States as employers' are no longer taken advantage of by their corporate counsel by engaging in frivolous litigation and argument that serve only to postpone citizens' rights to choose or not choose a union and enrich corporate counsel's pockets.

Thank you, James P. Faul